

Pilar C. French, OSB No. 962880
frenchp@lanepowell.com
Megan E. Smith, OSB No. 084758
smithme@lanepowell.com
LANE POWELL PC
601 SW Second Avenue, Suite 2100
Portland, Oregon 97204-3158
Telephone: 503.778.2100
Facsimile: 503.778.2200

Attorneys for Defendant Bank of America, National Association, as Successor in Interest to
Countrywide Bank, FSB

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
MEDFORD DIVISION

**JOHN WOODWORTH and GILDA
HODGES,**

Case No. 09-CV-3058-CL

Plaintiffs,

v.

**BANK OF AMERICA, NATIONAL
ASSOCIATION**, as successor in interest to
COUNTRYWIDE BANK, FSB;
**RECONTRUST COMPANY, NATIONAL
ASSOCIATION**, and **FEDERAL HOME
LOAN MORTGAGE CORPORATION, aka
FREDDIE MAC,**

Defendants.

**DECLARATION OF MEGAN E. SMITH
IN SUPPORT OF DEFENDANT BANK
OF AMERICA'S UNOPPOSED MOTION
FOR EXTENSION OF TIME TO FILE
REPLY TO MOTION TO DISMISS**

I, Megan E. Smith, declare as follows:

1. I am an attorney at Lane Powell PC, one of the attorneys of record for defendant Bank of America, National Association, as successor in interest to Countrywide Bank, FSB ("B of A"). I am competent to testify and make this declaration based on my personal

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B OF A'S UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE REPLY
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knowledge. I make this declaration in support of B of A's Unopposed Motion for Extension of Time to File Reply to Motion to Dismiss.

2. In the last two months, the attorneys of record for B of A, Pilar French and myself, have been inundated with new lawsuits, including several filed by *pro se* plaintiffs who are unwilling to compromise with us on response deadlines. In addition, we have been required to spend a considerable amount of time responding to and defending against multiple requests for preliminary injunctions. We have been working diligently to respond to the complaints and the requests for preliminary injunction, but need additional time to file the reply brief in this matter.

3. Oral argument on B of A's Motion to Dismiss has not yet been set. Accordingly, this request is not filed for the purpose of delay and no party will be prejudiced by the granting of this Motion. Plaintiffs do not oppose this Motion. This is Defendant's second request.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

DATED: September 10, 2010

s/ Megan E. Smith
Megan E. Smith

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B OF A'S UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE REPLY
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